

Exhibit D

John Highfield

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN) ECF Case
This document relates to: <i>Knight, et al. v. The Islamic Republic of Iran</i>	18-cv-12398 (GBD)(SN) ECF Case

DECLARATION OF JOHN HIGHFIELD

I, John Highfield, pursuant to 28 U.S.C. § 1746, do hereby declare under penalty of perjury as follows:

1. I am more than eighteen (18) years of age and I have personal knowledge of and am competent to testify to the matters stated in this declaration.
2. I was a citizen of the United States on September 11, 2001, and I remain so today.
3. On September 11, 2001, I was present in New York City when the terrorist attacks on the World Trade Center (WTC) occurred.
4. On the morning of September 11, 2001, I was on my way to work at the New York Stock Exchange where I was employed as the managing director for Tucker Anthony. I arrived at the PATH train station, under the World Trade Center in Lower Manhattan, a little before 9:00 a.m.
5. When I arrived, it was evident something catastrophic had happened. Police were shouting for everyone to exit the station. The air was full of black and gray smoke. People were running to get out and more police and other emergency personnel were coming in. It took a few minutes to reach the ground-level and, as I left the building, I looked up and saw that one of the towers was on fire and had a gaping hole in it.

6. I continued toward the Stock Exchange. When I reached the intersection of Broadway and Wall Street, the second plane hit the south tower. It felt like an earthquake. I ran the rest of way the to the Exchange where security let me in. There were guards armed with automatic weapons present in front of the Exchange. They locked the gates behind me.

7. Communication was limited. The phones were not working, but there were television monitors everywhere and we saw the news of the Pentagon being hit by a third plane and the crash of a fourth plane in a field in Pennsylvania. It was decided the market would not open and we were advised sometime around mid-morning that we that we could leave or stay at the Exchange. At this point, no one really knew what was going to happen next.

8. I left the Exchange at approximately 11:00 a.m. On the street outside everything was covered with dust and ash. It looked as if four inches of gray snow had fallen. There was some visibility, but the air was thick and as I breathed it felt like I had sand in my mouth. That would not be the last time I had that feeling. In the months following the attacks, the quality of the air in the vicinity of the WTC site was very poor. Smoke and ash remained in the air for the weeks following the attacks as the buildings that had burned and fallen continued to smolder. I continued to work on Wall Street until 2007.

9. I did not notice any serious health problems for several years after the attacks. In late 2006 or early 2007, I began was having difficulty, discomfort swallowing. In addition to this, I was experiencing other symptoms including discomfort in my chest. When my condition did not improve, I sought medical treatment.

10. Since 2007, I have been under the care of a gastroenterologist. I have been diagnosed with a form of stomach cancer and I have had at least thirty endoscopic procedures for the removal of lesions. This treatment is ongoing.

11. As a result of my exposure to the chemicals, dust, and ash emanating from Ground Zero in the days and months following 9/11, in addition to what I was exposed to on the day of the attacks, I have continued to suffer from medical issues. I am seen by a gastroenterologist every six months to monitor any progression in my condition.

12. After several years under the care of a private physicians, I was informed of the World Trade Center Health Program (WTCHP). I contacted the Program to see if there was anything that that could be done in addition to the treatment I was already receiving. My physical injuries and conditions were confirmed through the WTCHP and determined to be eligible for compensation by the Victim Compensation Fund (VCF).

13. I continue to seek medical treatment for the injuries I suffered in the immediate aftermath of 9/11. Following the evaluation of my conditions by the WTCHP, I pursued a claim with the VCF and was found eligible for compensation for gastro-esophageal reflux disease with esophagitis. A true and correct copy of the VCF eligibility determination letter documenting the physical injuries I suffered as a result of the attacks on 9/11 is submitted with this Declaration as part of this exhibit.

I DECLARE UNDER PENALTY OF PERJURY that the foregoing is true and correct. DATED this 28 day of March, 2025.


Declarant John Highfield



September 11th
Victim Compensation Fund

November 3, 2020

JOHN HIGHFIELD
[REDACTED]

Re: CLAIM NUMBER: VCF0076184

Dear JOHN HIGHFIELD:

The September 11th Victim Compensation Fund ("VCF") previously sent you an Eligibility determination letter on October 09, 2015 explaining the outcome of the review of your claim. The letter included a list of condition(s) deemed eligible for compensation. You then amended your claim to add one or more new conditions.

The VCF has considered your amended claim and reviewed the new information you provided. This letter sets forth the revised eligibility determination and supersedes and replaces the previous letter.

The Decision on your Claim

Based on the information you submitted and information the VCF has received from the World Trade Center ("WTC") Health Program, you have been found eligible for the injuries listed below. *This list includes all injuries for which you have been found eligible.*

- GASTRO-ESOPHAGEAL REFLUX DISEASE W/ ESOPHAGITIS

Please note that there are several reasons why an injury that you think should be eligible is not listed above. For non-traumatic injuries, the name of the injury is based on the information provided by the WTC Health Program and there may be different names for the same injury. Additionally, your injury may not be listed if it was only recently certified for treatment by the WTC Health Program.

If in the future the WTC Health Program should notify you that a condition previously found eligible is no longer certified, you must inform the VCF as this may affect your eligibility status and/or the amount of your award.

What Happens Next

You submitted the Compensation portion of your claim form. The VCF will contact you if additional information is needed in order to calculate your award. **If you believe your new condition(s) changes your compensation claim**, you should amend your claim. For example, if your new condition is the reason you are not able to work, you should provide that information to the VCF by amending your claim. Please see the www.vcf.gov website for additional details on how to amend your claim.



September 11th
Victim Compensation Fund

If your newly eligible condition(s) does not change your compensation claim, you do not need to take any action at this time.

If in the future the WTC Health Program certifies you for treatment for a condition that was not previously certified, you may amend your claim. The VCF will review the new information and determine if it provides the basis for a revised decision.

If you have questions about the information in this letter or the claims process in general, please call our toll-free Helpline at 1-855-885-1555. Please have your claim number ready when you call: VCF0076184. For the hearing impaired, please call 1-855-885-1558 (TDD). If you are calling from outside the United States, please call 1-202-514-1100.

Sincerely,

Rupa Bhattacharyya
Special Master
September 11th Victim Compensation Fund

cc: MICHAEL BARASCH